

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: BABY FOOD PRODUCTS LIABILITY
LITIGATION

This Document Relates to:
ALL ACTIONS

Case No. 24-md-3101-JSC

MDL 3101

Hon. Jacqueline Scott Corley

**JOINT STATEMENT FOR MAY 22, 2025
CASE MANAGEMENT CONFERENCE**

Date: May 22, 2025

Time: 9:00 a.m. PT

Location: Virtual (Zoom)

1 Plaintiffs and Defendants¹ respectfully submit this Case Management Conference Statement
2 in advance of the May 22, 2025 Case Management Conference. At the request of the parties and by
3 order of the Court, the Case Management Conference will be held virtually by Zoom.

4 **I. AMENDED MASTER COMPLAINT**

5 In accordance with Pretrial Order 16, on May 20, 2025, the parties filed a joint proposed
6 briefing schedule and process for (1) motions brought pursuant to Federal Rule of Civil Procedure
7 12 as to the Amended Master Complaint, filed by Plaintiffs on April 16, 2025 (“Amended Master
8 Complaint”), and the Fourth Amended Petition in *Watkins*; and (2) answering the Amended Master
9 Complaint and the Fourth Amended Petition in *Watkins*. The parties will be prepared to discuss this
10 stipulation with the Court.

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12 Dated: May 20, 2025

Respectfully submitted,

13 WAGSTAFF LAW FIRM

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Co-Lead Counsel for Plaintiffs in MDL 3101

27 ¹ As used herein, “Defendants” does not include any defendant who has not yet appeared in the
28 action (or who is challenging jurisdiction).

1
2 Dated: May 20, 2025

DLA PIPER LLP (US)

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10 *Defendants' Liaison Counsel*
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ATTESTATION OF CONCURRENCE IN FILING

In accordance with Northern District of California Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories who are listed on the signature page.

Dated: May 20, 2025

/s/ Brooke Killian Kim

Brooke Killian Kim

Defendants' Liaison Counsel

CERTIFICATE OF SERVICE

I certify that on May 20, 2025, I electronically filed the foregoing Joint Statement with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/ Brooke Killian Kim

Brooke Killian Kim